

## EXHIBIT A PLAINTIFFS' PROPOSED DISCOVERY PLAN

	<u>PHASE I</u> ~ 29 Depositions taken by Plaintiffs		Status Conference for Case Evaluation/ Settlement	<u>PHASE II</u> ~ 35 Depositions taken by Plaintiffs		Status Conference for Case Evaluation/ Settlement	<u>PHASE III</u> ~ 33 Depositions taken by Plaintiffs		Status Conference for Case Evaluation/ Settlement		
Plaintiffs' Discovery	Named Defendants Implicated in Individual Use of Force Incidents (25)	C. Graham: Complete - 1 depo taken	April 7 - 11, 2014	Named Defendants Implicated in Individual Use of Force Incidents (14)	L. Pickering: 2 Defendants	June 16 -20, 2014	Named Defendants Implicated in Individual Use of Force Incidents <i>Open Investigations</i> (13)	O. Sanders: 5 Defendants	TBD		
		R. Nunez: Complete - 2 depos taken			K. Bacote for 10/2010 incident: 6 Defendants			S. Ortiz: 2 Defendants			
		J. DeGros: 2 depos taken			R. Brye for 2012 incident: 4 Defendants			R. Brye for 2011 incident: 4 Defendants			
		S. Smallwood: 3 depos taken and 1 deposition confirmed			T. Woods: 2 Defendants			C. Sewell: 2 Defendants			
		M. Nunez: 3 depos confirmed, 1 noticed, 2 to be noticed									
		T. Woods: 1 depo confirmed, 5 depos noticed									
		K. Bacote for 4/2010 incident: 4 Defendants									
	Named Supervisory Defendants (0)	None		Named Supervisory Defendants (4)	Rose Agro-Doyle Kathleen Mulvey Emmanuel Bailey Edmond Duffy		Named Supervisory Defendants (11)	Dora Schriro Evelyn Mirabal Larry Davis, Sr. Mark Scott Michael Hourihane Carmine LaBruzzo Current Deputy Chief of Security Florence Finkle Carlton Newton Robert Cripps Ronald Jorgensen			
	Non-Party Witnesses (4)	Dr. Homer Venters Amanda Masters 30(b)(6) regarding video surveillance policies 30(b)(6) regarding training		Non-Party Witnesses (17)	Ruben Benitez Sean Cussen Janet Gooding Erik Berliner Brian Suprenant Sabina Blaskovic Mark Cranston Lewis Finkleman 9 Additional TBD		Non-Party Witnesses (9)	Linda Gibbs 8 Additional TBD			
Defendants' Discovery	Deposition of Plaintiffs	Christopher Graham, Ralph Nunez, Shameik Smallwood, Jose DeGros	Deposition of Plaintiffs	TBD	Deposition of Plaintiffs	TBD					
	Other Depositions	TBD	Other Depositions	TBD	Other Depositions	TBD					

<sup>1</sup> As of February 5, 2014.